

EXHIBIT 2

From: Vincent Russo <vrusso@robbinsfirm.com>

Sent: Friday, March 4, 2022 5:11 PM

To: Cross, David D. <DCross@mofo.com>; Bruce Brown <bbrown@brucepbrownlaw.com>; Halsey G. Knapp <hknapp@khlawfirm.com>

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Subject: Curling v. Raffensperger - Motion to Stay and Protocol for Halderman Production

External Email

David,

We intend to ask Judge Totenberg to stay the proceedings pending the appeals or, alternatively, to amend the schedule. We have briefly discussed this idea with Bruce as a party to the appeals, so you might have discussed it with him also. We intend to file the motion today and wanted to let you know before we file.

Additionally, we need to provide the Court a proposed protocol for the review of the discovery production from Dr. Halderman. The protocol in the attached Order on Plaintiffs' access to and testing of equipment produced by Fulton County provides a framework that is acceptable to us, subject to a few minor revisions. While we have no objection for the testing to be recorded by video, we do not think the recording needs to be produced upon completion of the testing since our consulting expert is not testifying or producing an expert report that relies on the testing. If for any reason the Court later decides that the video recording is needed for any purpose, we can produce it at that time. We also do not think paragraph 5 in the attached order is relevant.

If Curling Plaintiffs have an alternative protocol related to the discovery production from Dr. Halderman, please send it to us for consideration.

Thanks,

Vincent

ROBBINS

Vincent R. Russo

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